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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION  
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12 RICHARD KADREY, *et al.*,

13 Individual and Representative  
14 Plaintiffs,

15 v.

16 META PLATFORMS, INC., a Delaware  
corporation,

17 Defendant.  
18

Case No. 3:23-cv-03417-VC

**STIPULATION AND ~~[PROPOSED]~~  
ORDER EXTENDING DEADLINE FOR  
THIRD-PARTY SEALING OF SUMMARY  
JUDGMENT BRIEFS**

19 Pursuant to Civ. L.R. 6-2 and 7-12, Plaintiffs Richard Kadrey, Sarah Silverman, Christopher  
20 Golden, Jacqueline Woodson, Andrew Sean Greer, Rachel Louise Snyder, David Henry Hwang,  
21 Ta-Nehisi Coates, Laura Lippman, Matthew Klam, Junot Díaz, Lysa Terkeurst and Christopher  
22 Farnsworth (“Plaintiffs”); and Defendant Meta Platforms, Inc. (“Meta”) (collectively, the  
23 “Parties”), by and through their respective counsel, stipulate to the following:

- 24 1. On March 12, 2025, the Court entered an order directing the parties to refile each summary  
25 judgment brief and any motions to seal excerpts of the brief within 5 days of the initial filing  
26 deadline. Dkt. 477. That order also set an April 25, 2025 deadline for publicly refiling  
27 summary judgment exhibits and motions to seal summary judgment exhibits (i.e., the Friday  
28 before the summary judgment hearing). *Id.*

2. On April 7, 2025, Plaintiffs filed a combined summary judgment opposition and reply brief. Dkt. 517. Plaintiffs' brief references information over which two third parties<sup>1</sup> have asserted confidentiality. Those passages are located at:

- Page 28, footnote 15;
- Page 30, lines 9-10; and
- Page 30, footnote 17.

3. Plaintiffs also filed three exhibits originally produced by these third parties, and over which the third parties have asserted confidentiality:

- Plaintiffs' Exhibit 134;
- Plaintiffs' Exhibit 135; and
- Plaintiffs' Exhibit 139.

4. Plaintiffs are coordinating with the third parties regarding the sealing declaration process for these materials, as outlined in Civ. L-R 79-5(f). Those discussions are ongoing, continuing into this week.

5. To afford sufficient time for the third parties to prepare their sealing declarations, and to reduce the burden on third parties that would result from filing two separate sealing declarations for Plaintiffs' brief and Plaintiffs' exhibits, the parties stipulate as follows:

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and through Plaintiffs and Meta, as represented by their undersigned counsel and subject to the approval of the Court, that the third parties shall be afforded until April 25, 2025 to file a declaration in support of sealing the implicated passages of Plaintiffs' April 7 brief alongside their declaration in support of sealing the summary judgment exhibits. The implicated passages of Plaintiffs' April 7 brief have been refiled in redacted form pending submission of the third-party sealing declarations.

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<sup>1</sup> Plaintiffs do not reference the third parties by name due to confidentiality considerations and the Court's prior sealing guidance. *See* Dkt. 498.

1 Dated: April 14, 2025

Respectfully Submitted,

2 By /s/ Matthew Brigham

By /s/ Jay Schuffenhauer

3 Bobby A. Ghajar  
4 Colette Ani Ghazarian  
5 COOLEY LLP  
6 1333 2nd Street, Suite 400  
7 Santa Monica, CA 90401  
8 Telephone: (310) 883-6400  
9 Facsimile: (310) 883-6500  
10 Email: bghajar@cooley.com  
11 cghazarian@cooley.com

BOIES SCHILLER FLEXNER LLP  
David Boies (*pro hac vice*)  
333 Main Street  
Armonk, NY 10504  
(914) 749-8200  
dboies@bsfllp.com

12 Mark R. Weinstein  
13 Matthew Brigham  
14 Elizabeth Lee Stameshkin  
15 COOLEY LLP  
16 3175 Hanover Street  
17 Palo Alto, CA 94304  
18 Telephone: 650-843-5000  
19 Facsimile: 650-849-7400  
20 Email: mweinstein@cooley.com  
21 Email: mbrigham@cooley.com  
22 Email: lstameshkin@cooley.com

Maxwell V. Pritt (SBN 253155)  
Joshua M. Stein (SBN 298856)  
Margaux Poueymirou (SBN 356000)  
44 Montgomery Street, 41st Floor  
San Francisco, CA 94104  
(415) 293-6800  
mpritt@bsfllp.com  
jstein@bsfllp.com  
mpoueymirou@bsfllp.com

Jesse Panuccio (*pro hac vice*)  
Jay Schuffenhauer (*pro hac vice*)  
1401 New York Ave, NW  
Washington, DC 20005  
(202) 237-2727  
jpanuccio@bsfllp.com  
jschuffenhauer@bsfllp.com

Kathleen R. Hartnett  
Judd D. Lauter  
COOLEY LLP  
3 Embarcadero Center, 20th Floor  
San Francisco, CA 94111-4004  
Telephone: (415) 693-2071  
Facsimile: (415) 693-2222  
Email: khartnett@cooley.com

Joshua I. Schiller (SBN 330653)  
David L. Simons (*pro hac vice*)  
55 Hudson Yards, 20th Floor  
New York, NY 10001  
(914) 749-8200  
jischiller@bsfllp.com  
dsimons@bsfllp.com

Angela Dunning  
CLEARY GOTTLIEB STEEN &  
HAMILTON LLP  
1841 Page Mill Road, Suite 250  
Palo Alto, CA 94304-1248  
Telephone: (650) 815-4131  
Email: adunning@cgsh.com

*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

23 *Attorneys for Defendant*  
24 *META PLATFORMS, INC.*

**~~PROPOSED~~ ORDER**

Pursuant to the stipulation of the Parties, **IT IS SO ORDERED.**

DATED: April 23, 2025

  
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HON. VINCE CHHABRIA  
United States District Judge